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BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, D.C. 20554

RE: Ex parte presentation: IB Docket No. 04-112 – Reporting Requirements of
U.S. Providers of International Telecommunications Services

Dear Ms. Dortch:

On April 3, 2012, William Reynolds, Juan Sanz, and the undersigned, representing Sprint Nextel Corporation (“Sprint”), spoke by telephone with David Krech, Mark Uretsky, Sean O’More and Cathy Hsu of the International Bureau to discuss the above-referenced proceeding. The Sprint representatives discussed potential changes in the international circuit status report required under Section 43.82 of the Commission’s rules with regard to submarine cable systems.

Specifically, the Sprint representatives expressed their support for a streamlined report that would indicate the reporting party’s circuit capacity on a cable system by cable system basis, such capacity to be determined by the reporting party’s ownership of transmission capacity on the system, the capacity controlled by indefeasible rights of use (IRUs) held by the reporting party, and the net capacity controlled by the reporting party through inter-carrier leases (ICLs). Noting the difficulties in determining “active” versus “idle” status for capacity used for IP-based packet network transmissions based on whether a particular circuit was actually “in use” at a given point in time, the Sprint representatives suggested that the reporting party would distinguish between capacity that had been activated for use (“active circuits”), and capacity that had not been activated for use but was held in reserve (“idle circuits”). Sprint supports STM-1 (155.52 Mbps), or fractions or multiples thereof, as the unit of measure of such capacity. Sprint strongly believes that a revised cable circuit status report with these attributes would greatly reduce the burden on reporting parties while still providing the Commission with basic information on the size, ownership and control, and status of submarine cable capacity held by U.S. providers.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Nall", written in a cursive style.

David A. Nall

/dan

CC: David Krech (by email)
Mark Uretsky (by email)
Sean O’More (by email)
Cathy Hsu (by email)